

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

BRETT CALDWELL, an individual,  
  
Plaintiff,  
  
v.  
THE BOEING COMPANY, a Delaware  
Corporation and DOES 1-10;  
  
Defendants.

Case No. 2:17-cv-01741-JLR **AND ORDER**  
**STIPULATED MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO COMPLAINT AND TO  
ESTABLISH A BRIEFING SCHEDULE  
FOR DEFENDANT'S ANTICIPATED  
MOTION TO DISMISS**

**NOTING DATE: DECEMBER 21, 2017**

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to extend the deadline for Defendant The Boeing Company ("Boeing") to file its Response to Plaintiff's Complaint and to establish a stipulated briefing schedule for the motion to dismiss that Boeing anticipates filing. In support of this stipulated motion, the Parties state as follows:

1. Mr. Caldwell filed his Complaint on November 17, 2017 and served Boeing on November 21, 2017. (See Dkt. Nos. 1 & 7).

2. On December 7, 2017, the Parties filed a Stipulated Motion for Extension of Time to Respond to Complaint, requesting that Boeing's response to Mr. Caldwell's Complaint be due on or before December 29, 2017. (Dkt. No. 8). The Court granted the Parties' motion on December 8, 2017 and extended Boeing's deadline to answer, move, or otherwise respond to Mr. Caldwell's Complaint to December 29, 2017. (Dkt. No. 10).

STIPULATED MOTION FOR EXTENSION OF TIME  
AND TO ESTABLISH BRIEFING SCHEDULE - 1

FOX ROTHSCHILD LLP  
Attorneys at Law  
1001 Fourth Avenue, Suite 4500  
Seattle, WA 98154  
206.624.3600

1           3.     After the Court's Order, Mr. Caldwell's counsel contacted Boeing's counsel and inquired  
2 whether Boeing would agree to an extension of time for Mr. Caldwell to respond to any motion to  
3 dismiss that Boeing may file in light of the upcoming holidays and Mr. Caldwell's counsel's health  
4 issues. Boeing's counsel indicated that Boeing anticipates filing a motion to dismiss and that Boeing  
5 would agree to such an extension. Thereafter, the Parties' counsel agreed upon the following briefing  
6 schedule for Boeing's anticipated motion to dismiss:

- 7           a.   Friday, January 12, 2018 – Deadline for Boeing to answer, move, or otherwise  
8                respond to Mr. Caldwell's Complaint;
- 9           b.   Monday, February 12, 2018 – Deadline for Mr. Caldwell to oppose any motion to  
10               dismiss that Boeing may file;
- 11           c.   Friday, February 23, 2018 – Deadline for Boeing to file any reply in support of its  
12               motion to dismiss;
- 13           d.   Friday, February 23, 2018 – Noting Date for any motion to dismiss that Boeing  
14               may file.

15           WHEREFORE, the Parties therefore join in asking the Court to extend the deadline for  
16 Defendant to answer, move, or otherwise respond to the Complaint until January 12, 2018 and to issue  
17 an Order establishing the stipulated briefing schedule described above.

1 DATED this 21st day of December 2017:

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3 HELSELL FETTERMAN LLP

4 By: /s/ Lauren Parris Watts

5 Lauren Parris Watts, WSBA #44064  
6 1001 Fourth Avenue, Suite 4200  
7 Seattle, WA 98154-1154  
8 Phone: (206) 292-1144  
9 Fax: (206) 340-0902  
10 lwatts@helsell.com

11 HANEY & YOUNG LLP

12 Steven H. Haney, admitted *pro hac vice*  
13 Gregory L. Young, admitted *pro hac vice*  
14 1055 West Seventh Street, Suite 1950  
15 Los Angeles, CA 90017  
16 Phone: (213) 228-6500  
17 Fax: (213) 228-6501

18 *Attorneys for Plaintiff*  
19 BRETT CALDWELL

20 FOX ROTHSCHILD LLP

21 By: /s/ Laurence A. Shapero

22 Laurence A. Shapero, WSBA #31301  
23 1001 Fourth Avenue, #4500  
24 Seattle, WA 98154  
25 Phone: 206-624-3600  
26 Fax: 206-389-1708  
lshapero@foxrothschild.com

MORGAN, LEWIS & BOCKIUS LLP

Lincoln O. Bisbee, admitted *pro hac vice*  
P. David Larson, admitted *pro hac vice*  
1111 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Phone: (202) 739-3000  
Fax: (202) 739-3001  
lincoln.bisbee@morganlewis.com  
david.larson@morganlewis.com

*Attorneys for Defendant*  
THE BOEING COMPANY

27 STIPULATED MOTION FOR EXTENSION OF TIME  
28 AND TO ESTABLISH BRIEFING SCHEDULE - 3

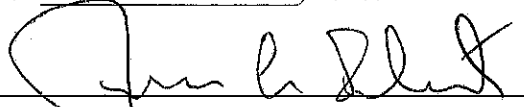
FOX ROTHSCHILD LLP  
Attorneys at Law  
1001 Fourth Avenue, Suite 4500  
Seattle, WA 98154  
206.624.3600

**PROPOSED ORDER**

Pursuant to the stipulated motion of the parties as set forth above, IT IS HEREBY ORDERED that the motion is GRANTED, and IT IS HEREBY ORDERED that the deadline for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint is extended to January 12, 2018. IT IS FURTHER ORDERED that the deadlines related to any motion to dismiss that Defendant Boeing may file are established as follows:

1. Friday, January 12, 2018 – Deadline for Boeing to answer, move, or otherwise respond to Mr. Caldwell's Complaint;
2. Monday, February 12, 2018 – Deadline for Mr. Caldwell to oppose any motion to dismiss that Boeing may file;
3. Friday, February 23, 2018 – Deadline for Boeing to file any reply in support of its motion to dismiss;
4. Friday, February 23, 2018 – Noting Date for any motion to dismiss that Boeing may file.

IT IS SO ORDERED this <sup>ND</sup> 22 day of December, 2017.

  
THE HONORABLE JAMES L. ROBART  
United States District Judge

1 *Presented by:*

2  
3 HELSELL FETTERMAN LLP

4 By: /s/ Lauren Parris Watts

5 Lauren Parris Watts, WSBA #44064  
6 1001 Fourth Avenue, Suite 4200  
7 Seattle, WA 98154-1154  
8 Phone: (206) 292-1144  
9 Fax: (206) 340-0902  
10 lwatts@helsell.com

11 HANEY & YOUNG LLP

12 Steven H. Haney, admitted *pro hac vice*  
13 Gregory L. Young, admitted *pro hac vice*  
14 1055 West Seventh Street, Suite 1950  
15 Los Angeles, CA 90017  
16 Phone: (213) 228-6500  
17 Fax: (213) 228-6501

18 *Attorneys for Plaintiff*  
19 BRETT CALDWELL

FOX ROTHSCHILD LLP

By: /s/ Laurence A. Shapero

Laurence A. Shapero, WSBA #31301  
1001 Fourth Avenue, #4500  
Seattle, WA 98154  
Phone: 206-624-3600  
Fax: 206-389-1708  
lshapero@foxrothschild.com

MORGAN, LEWIS & BOCKIUS LLP

Lincoln O. Bisbee, admitted *pro hac vice*  
P. David Larson, admitted *pro hac vice*  
1111 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Phone: (202) 739-3000  
Fax: (202) 739-3001  
lincoln.bisbee@morganlewis.com  
david.larson@morganlewis.com

*Attorneys for Defendant*  
THE BOEING COMPANY

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STIPULATED MOTION FOR EXTENSION OF TIME  
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FOX ROTHSCHILD LLP  
Attorneys at Law  
1001 Fourth Avenue, Suite 4500  
Seattle, WA 98154  
206.624.3600

**CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2017, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which caused a true and correct copy of the foregoing to be served upon:

Lauren Parris Watts, WSBA #44064  
HELSELL FETTERMAN LLP  
1001 Fourth Avenue, Suite 4200  
Seattle, WA 98154-1154  
Phone: (206) 292-1144  
Fax: (206) 340-0902  
lwatts@helsell.com

Steven H. Haney  
Gregory L. Young  
HANEY & YOUNG LLP  
1055 West Seventh Street, Suite 1950  
Los Angeles, CA 90017  
Phone: (213) 228-6500  
Fax: (213) 228-6501  
shaney@haneyyoung.com  
gyoung@haneyyoung.com

*Attorneys for Plaintiff Brett Caldwell*

/s/ P. David Larson  
P. David Larson, *admitted pro hac vice*  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Phone: (202) 739-3000  
Fax: (202) 739-3001  
Email: david.larson@morganlewis.com

*Attorney for Defendant The Boeing Company*